

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,

Plaintiff,

v.

MARK A. MILLER, SAEID  
JABERIAN, and CHRISTOPHER J.  
RAJKARAN,

Defendants.

Case No. 21-CV-01445 (DSD/ECW)

**PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT  
AGAINST DEFENDANT SAEID JABERIAN**

Plaintiff United States Securities and Exchange Commission ("SEC"), pursuant to Rule 56 of the Federal Rules of Civil Procedure and LR 7.1(c), respectfully moves this Court for partial summary judgment against Defendant Saeid Jaberian and for an order imposing injunctive relief. The SEC is filing a supporting Memorandum of Law, the Declaration of Alyssa A. Qualls, and a proposed order.

Dated: February 21, 2025

/s/ Alyssa A. Qualls

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 21, 2025, I served the Plaintiff's Motion for Partial Summary Judgment against Defendant Saeid Jaberian upon the following individuals as indicated below:

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/s/ Alyssa A. Qualls  
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